

FILED UNDER SEAL

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA : **CRIMINAL NO. 21-**
v. : **DATE FILED:**
CORNELIUS WILLIAMS : **VIOLATIONS:**
: **18 U.S.C. § 924(a)(1)(A) (making false**
: **statements to federal firearms**
: **licensees - 5 counts)**
: **Notice of forfeiture**

INDICTMENT

COUNTS ONE THROUGH FIVE

THE GRAND JURY CHARGES THAT:

At all times material to this indictment:

1. Delco Shooting Supply, located at 1107 Lincoln Avenue, in Prospect Park, in the Eastern District of Pennsylvania, possessed a federal firearms license and was authorized to deal in firearms under federal laws.

2. DJM Sporting Good LLC, located at 424 Pennsylvania Avenue, in Prospect Park, in the Eastern District of Pennsylvania, possessed a federal firearms license and was authorized to deal in firearms under federal laws.

3. Federal firearms license ("FFL") holders are licensed, among other things, to sell firearms and ammunition. Various rules and regulations, promulgated under the authority of Chapter 44, Title 18, United States Code, govern the manner in which FFL holders are permitted to sell firearms and ammunition.

4. The rules governing FFL holders require that a person seeking to purchase a firearm fill out a Firearm Transaction Record, ATF Form 4473. Part of the Form 4473 requires

that the prospective purchaser certify that all of his or her answers on Form 4473 are true and correct. Question 11(a) of ATF Form 4473 requires that the prospective purchaser certify truthfully that he or she is the actual buyer of the firearm. The ATF Form 4473 contains language warning that “You are not the actual buyer if you are acquiring the firearm(s) on behalf of another person. If you are not the actual buyer, the dealer cannot transfer the firearm(s) to you.” The Form 4473 also contains language warning that all information provided must be certified as “true, correct, complete,” and that providing false information in response to Question 11(a) is a “crime punishable as a felony under federal law.”

5. FFL holders are required to maintain a record, in the form of a completed ATF Form 4473, of the identity of the actual buyer of firearms sold by the FFL holder, including the buyer’s home address and date of birth, to ensure that the person was not prohibited from purchasing a firearm.

6. On or about the dates listed below, in Prospect Park, in the Eastern District of Pennsylvania, defendant

CORNELIUS WILLIAMS,

in connection with the acquisition of each of the firearms listed below from the FFL holders listed below, knowingly made a false statement and representation with respect to information required by the provisions of Chapter 44, Title 18, United States Code, to be kept in the FFL holder’s records, in that, defendant WILLIAMS certified on the Form 4473, that he was the actual buyer of the firearm, when in fact, as defendant knew, this statement was false and fictitious, with each Form 4473 constituting a separate count:

Count	Date	FFL	Firearm(s)
One	December 13, 2017	Delco Shooting Supply (FFL No. 82304258)	Taurus, Model PT111G2, 9mm semi-automatic pistol, bearing serial no. TKS47384
Two	December 19, 2017	Delco Shooting Supply (FFL No. 82304258)	Taurus, Model PT709 Slim, 9mm semi-automatic pistol, bearing serial no. TFO064002
Three	February 11, 2019	DJM Sporting Good LLC (FFL No. 82310802)	Taurus, Model G2C, .40 caliber semi-automatic pistol, bearing serial no. SL253103
Four	February 23, 2019	DJM Sporting Good LLC (FFL No. 82310802)	Taurus, Model G2C, 9mm semi-automatic pistol, bearing serial no. TLZ43470
Five	February 26, 2019	DJM Sporting Good LLC (FFL No. 82310802)	Taurus, Model G2C, .40 caliber semi-automatic pistol, bearing serial no. SMA04122

All in violation of title 18, United States Code, Section 924(a)(1)(A).

NOTICE OF FORFEITURE

THE GRAND JURY FURTHER CHARGES THAT:

As a result of the violations of Title 18, United States Code, Section 924(a)(1)(A), set forth in this indictment, defendant

CORNELIUS WILLIAMS

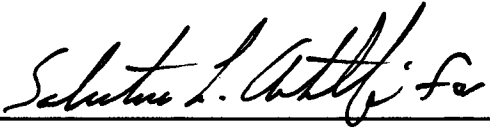
shall forfeit to the United States of America all firearms and ammunition involved in the commission of such offenses, including, but not limited to:

1. a Taurus, Model PT111G2, 9mm semi-automatic pistol, bearing serial number TKS47384;
2. a Taurus, Model PT709 Slim, 9mm semi-automatic pistol, bearing serial number TFO064002;
3. a Taurus, Model G2C, .40 caliber semi-automatic pistol, bearing serial number SL253103;
4. a Taurus, Model G2C, 9mm semi-automatic pistol, bearing serial number TLZ43470; and
5. a Taurus, Model G2C, .40 caliber semi-automatic pistol, bearing serial number SMA04122.

All pursuant to Title 28, United States Code, Section 2461(c), and Title 18, United States Code, Section 924(d).

A TRUE BILL:


GRAND JURY FOREPERSON


JENNIFER ARBITTIER WILLIAMS
Acting United States Attorney

No. _____

UNITED STATES DISTRICT COURT

Eastern District of Pennsylvania

Criminal Division

THE UNITED STATES OF AMERICA

vs.

CORNELIUS WILLIAMS

INDICTMENT

18 U.S.C. § 924(a)(1)(A)(false statement to a federal firearms dealer – 5 counts)
Notice of forfeiture

Affirmation

[REDACTED]

Filed in open court this _____ day,
Of _____ A.D. 20 _____

Clerk

Bail, \$ _____